

**IN THE CIRCUIT COURT OF                      COUNTY, MISSISSIPPI**

**PLAINTIFF**

**VS.**

**NO.**

**, M.D. and                      , M.D.                      DEFENDANTS**

**REQUESTS FOR DISCOVERY**

**INTERROGATORIES**

NOW COMES Dr.                      , Defendant herein, by counsel, and pursuant to the provisions of Rule 33, M.R.C.P., propounds the following interrogatories to the plaintiff to be answered within' the tine and in the manner prescribed by the said rule, to-wit:

1. Pursuant to the provisions of Rule 26(b)(4)(A)(i), M.R.C.P., identify each person whom you expect to call as an expert witness at trial, state the subject matter on which each expert is expected to testify, state the substance of the facts and opinions to which each expert is expected to testify, and state a summary of the grounds for each expert's opinions.

2. State the name, address, place of employment and telephone number of each and every person known to you, or to your attorneys, who has knowledge of relevant or discoverable information regarding any of the facts and matters stated in your complaint.

3. State the name, address, place of employment and telephone number of each and every person from whom a written, recorded, transcribed or oral a statement was obtained, identify the person who obtained each statement, and identify each person now having possession of the original or a copy of each statement.

4. If photographs, videotapes, diagrams, models, or other items of any description whatsoever have been prepared or obtained in connection with the facts and matters stated in the complaint, then please describe each item in sufficient detail so as to support a request for production.

5. If you contend that the allegations stated in the complaint against this defendant are supported by any medical text, medical journal, learned treatise, periodical, encyclopedia, or other document of any description, then please describe each item in sufficient detail so as to support a request for production.

6. If you learned of this defendant's alleged negligence or malpractice from any medically trained person, then identify that person by stating his or her name, address, place of employment and telephone number.

7. Identify each and every expert consultant or witness who has been retained by you or on your behalf in connection with the facts and matters stated in the complaint, but who is not expected to be called as a witness at trial.

8. Describe the educational and employment history of the plaintiff, including in your answer the names of all schools attended, the dates of attendance and a description of any received and with prior employment, and state the reason for the termination of each of the employment relationships.

9. Set forth individually and itemize each and every expense which you contend has been incurred as a result of the incident described in your complaint.

10. With regard to each expense, state what if any amount thereof has been paid or will be paid by Medicare, Medicaid or by any private insurance company.

11. Identify each and every person or organization which may have a subrogation claim involving the proceeds of any judgment or settlement which might result from the filing of your complaint herein.

12. State the name, address and telephone number of each and every licensed health care practitioner by whom the plaintiff was seen or treated during the five years preceding the incident described in your complaint. Include in your answer the date or approximate dates upon which services were rendered by each of the licensed health care practitioners identified in your response, and briefly describe the nature of the condition or illness which caused the plaintiff to be treated on each occasion.

13. State the name, address and telephone number of each and every hospital, clinic or institution to which the plaintiff was admitted for any reason during the five years preceding the incident described in your complaint. Include in your answer the date or approximate dates of confinement at each institution and briefly describe the nature of the illness or condition number of each and every licensed health care practitioner by whom the plaintiff has been seen or treated since the occurrence of the incident described in your complaint. Include in your answer the date or approximate dates upon which services were rendered by each of the health care practitioners identified in your response and briefly describe the nature of the condition or illness which caused the plaintiff to be treated on each occasion.

15. State the name, address and telephone number of each and every hospital, clinic or other institution to which the Plaintiff has been admitted following the occurrence of the incident described in your complaint. Include in your answer the date or approximate dates of confinement at each institution and briefly describe the nature of the illness or condition which caused the plaintiff to be confined on each occasion.

16. State specifically how you contend that the injury which is mentioned in Paragraphs of your complaint occurred. State in your answer when you contend that this injury occurred.

17. By way of a request for admission pursuant to the provisions of Rule 36, M.R.C.P., and for the purpose of the pending action only, please admit the truth of the following statements:

(a) The injury which is described in your complaint occurred as a result of the administration of anesthesia through a procedure known as an auxiliary block.

(b) The surgical procedure which Dr. performed is not a proximate cause or proximate contributing cause of the injury described in the complaint.

18. If you denied any of the above stated requests for admissions, then for each request which you denied please state a concise factual and/or legal reason for your denial.

#### REQUESTS FOR PRODUCTION OF DOCUMENTS

NOW COMES Dr. , Defendant, herein, by counsel, and pursuant to the provisions of Rule 34, M.R.C.P., requests production of the following documents and things. The defendant requests production of the following items on , , at a.m/p.m. at the offices of , , Mississippi, at a.m/p.m.

In the alternative, the defendant requests production of the following items by regular United States Mail, in which the case the reasonable costs of copying is hereby tendered.

1. The defendant requests production of each statement identified in response to Interrogatory No. 3 above.

2. The defendant requests production of each medical journal, medical treatise, periodical, encyclopedia, text or other item identified in response to question and as referred to in response to Interrogatory No. 9 above.

3. The defendant requests production of each and every photograph, videotape, model, diagram or other item identified in response to Interrogatory No.4 above.

4. The defendant requests production of the records of all health care professionals and health care provided identified in responses to Interrogatories No. 12, 13, 14, and 15.

5. The defendant requests production of any and all documents tendered to or reports rendered by the expert witnesses and/or consultants identified in response to Interrogatories No. 1 and 7 above.

6. The defendant requests production of income tax returns and W-2 forms providing information regarding the earnings of the plaintiff during the past years.

PROPOUNDED this the day of , 20 .

Respectfully submitted,

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Attorney for

Of Counsel:

Telephone:  
MSB #  
Attorney for